

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

Torvent LLC,	)	
Plaintiff,	)	
v.	)	
Techtronic Industries Co., Ltd.; Techtronic Industries	)	Civil Action No. 1:21-cv-00853-JPM
North America, Inc.; One World Technologies, Inc.;	)	
Homelite Consumer Products, Inc.; Hart Consumer	)	Civil Action No. 1:22-cv-01617-JPM
Products, Inc.; Home Depot, U.S.A., Inc.; and	)	
Walmart Inc.,	)	
	)	<b>JURY TRIAL DEMANDED</b>
Defendants.	)	
and,	)	<div style="background-color: black; width: 230px; height: 35px;"></div>
	)	
Techtronic Industries Co., Ltd.; Techtronic Industries	)	
North America, Inc.; One World Technologies, Inc.;	)	
Homelite Consumer Products, Inc.; Hart Consumer	)	
Products, Inc.;	)	
	)	
Counterclaim Plaintiffs,	)	
	)	
v.	)	
	)	
Torvent, LLC, Torvian, Inc., and First-to-Invent,	)	
LLC	)	
	)	
Counterclaim Defendants.	)	

**ATTORNEY DECLARATION OF MICHAEL SIKORA IN SUPPORT OF  
MOTION FOR SUMMARY JUDGMENT**

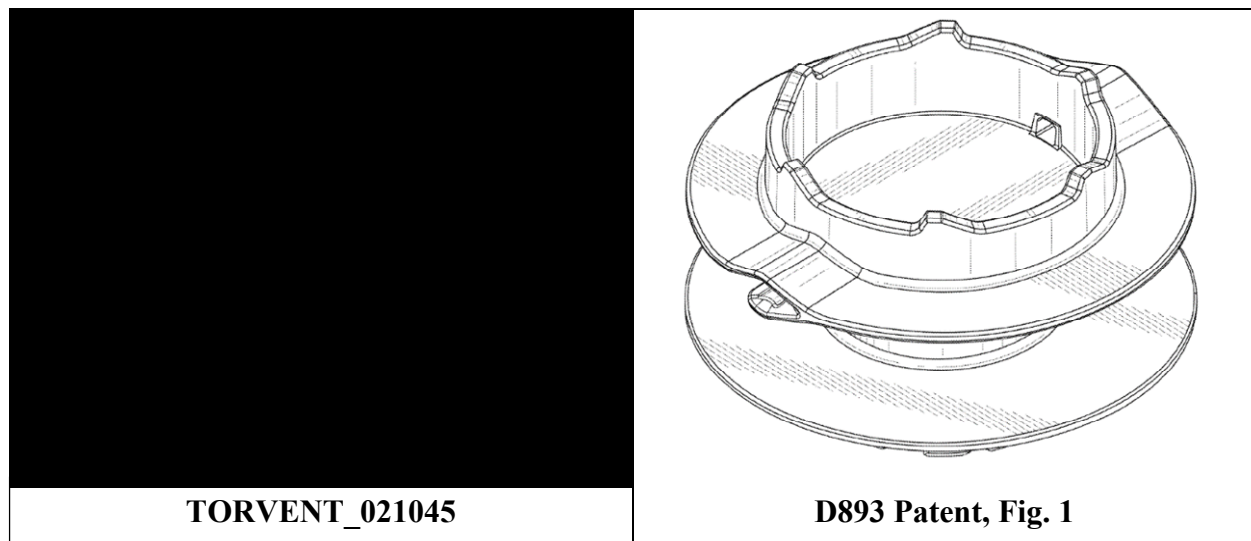
I, Michael Sikora, declare as follows:

1. I am counsel for the above-identified Defendants and Counterclaim Plaintiffs in this case.

2. **Exhibit 1** to this declaration is a true and correct copy of U.S. Design Patent No. 814,893 (the “D893 Patent”).

3. **Exhibit 2** to this declaration is a true and correct copy of Torvent’s Third Supplemental Interrogatory Responses to Individual Interrogatory Nos. 1-12, 15 (dated July 28, 2023).

4. **Exhibit 3** to this declaration is a true and correct copy of a document produced by Torvent beginning at TORVENT\_021045. According to Torvent’s “Second Amended Response” to Individual Interrogatory No. 4 (*see* Exhibit 2), this is “[a]n engineering drawing of the LX502 Trimmer Head with ‘Initial Release’ date of May 16, 2014.” Below is a side-by-side comparison of the spool shown at TORVENT\_021045 and the D893 Patent, Figure 1:



5. **Exhibit 4** to this declaration is a true and correct copy of email correspondence produced by Torvent beginning at TORVENT\_023314.

6. **Exhibit 5** to this declaration is a true and correct copy of email correspondence produced by Torvent beginning at TORVENT\_025208, including attachments.

7. **Exhibit 6** to this declaration is a true and correct copy of email correspondence produced by Torvent beginning at TORVENT\_024199, including attachments.

8. **Exhibit 7** to this declaration is a true and correct copy of email correspondence produced by Torvent beginning at TORVENT\_108871, including attachments. TORVENT\_108884 is the Bates number placeholder for the native Edrawings file attached to this email correspondence.

9. **Exhibit 8** to this declaration is a true and correct copy of email correspondence produced by Torvent beginning at TORVENT\_108885, including attachments. TORVENT\_108896 is the Bates number placeholder for the native Edrawings file attached to this email correspondence.

10. **Exhibit 9** to this declaration is a true and correct copy of email correspondence produced by Torvent beginning at TORVENT\_023869, including attachments. TORVENT\_023885 is the Bates number placeholder for the native Edrawings file attached to this email correspondence.

11. **Exhibit 10** to this declaration is a true and correct copy of excerpts from the deposition of Mr. George Alliss, taken on September 21, 2023.

12. **Exhibit 11** to this declaration is a comparison between the figures of the D893 Patent and true and correct images generated from the native Solidworks 3D Edrawing file (file name “[REDACTED]”) produced at TORVENT\_023885 (an attachment within Exhibit 9) by taking screen clippings of the parts shown in the natively produced file at various angles.

13. **Exhibit 12** to this declaration is a true and correct copy of Torvent's, Torvian's and First-to-Invent's First Supplemental Responses to Common Interrogatory Nos. 1-9 (dated July 28, 2023).

14. **Exhibit 13** to this declaration is a true and correct copy of email correspondence produced by Torvent beginning at TORVENT\_024124, including attachments.

15. **Exhibit 14** to this declaration is a true and correct copy of email correspondence produced by Torvent beginning at TORVENT\_024305, including attachments.

16. **Exhibit 15** to this declaration is a true and correct copy of email correspondence produced by Torvent beginning at TORVENT\_024487, including attachments.

17. **Exhibit 16** to this declaration is a true and correct copy of email correspondence produced by Torvent beginning at TORVENT\_025864.

18. **Exhibit 17** to this declaration is a true and correct copy of email correspondence produced by Torvent beginning at TORVENT\_064847.

19. **Exhibit 18** to this declaration is a true and correct copy of a Wayback Machine record of the Cobramax website captured on January 15, 2016. This record can be publicly accessed from the following link:  
<https://web.archive.org/web/20160115033152/https://www.getcobramax.com/>.

20. **Exhibit 19** to this declaration is a true and correct copy of U.S. Patent No. 9,516,807.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: January 3, 2024

Respectfully submitted,



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Michael Sikora

Dated: January 3, 2024

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## **CERTIFICATE OF SERVICE**

I certify that on January 3, 2024, a true and correct copy of the foregoing document was caused to be served on the parties listed below via e-mail:

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/s/ Amy M. Dudash

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